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12 [Additional counsel listed on signature pages]

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14 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

15 IN RE TFT-LCD (FLAT PANEL)  
16 ANTITRUST LITIGATION

17 This Document Relates to:

18 *Alfred H. Siegel, As Trustee of the Circuit*  
19 *City Stores, Inc. Liquidating Trust v. AU*  
*Optronics Corporation, et al.*, Case No.  
20 10-Cv-05625 SI

21 *AT&T Mobility LLC, et al. v. AU Optronics*  
22 *Corporation, et al.*, Case No. 3:09-cv-4997 SI

23 *Best Buy Co., Inc., et al. v. AU Optronics*  
24 *Corporation, et al.*, Case No. 10-cv-04572 SI

25 *Costco Wholesale Corporation v. AU*  
26 *Optronics Corporation, et al.*, Case No.  
11-cv-00058 SI

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Master File No. C M:07-01827 SI  
MDL NO. 1827

**STIPULATION AND [PROPOSED]  
ORDER REGARDING SCHEDULE  
TO ANSWER OR RESPOND TO  
DEFENDANT LG DISPLAY'S  
COUNTERCLAIMS**

27 Master File No. C M:07-01827 SI  
28 MDL NO. 1827

STIPULATION AND [PROPOSED] ORDER  
REGARDING SCHEDULE TO ANSWER  
OR RESPOND TO DEFENDANT  
LG DISPLAY'S COUNTERCLAIMS

1           *Electrograph Systems, Inc., et al. v. Epson*  
2           *Imaging Devices Corporation, et al.*, Case No.  
3           10-cv-00117 SI

4           *Interbond Corporation of America v. AU*  
5           *Optronics Corporation, et al.*, Case No.  
6           3:11-cv-03763 SI

7           *Jaco Electronics, Inc. v. AU Optronics*  
8           *Corporation, et al.*, Case No. 3:11-cv-02495 SI

9           *Motorola Mobility, Inc. v. AU Optronics*  
10          *Corporation, et al.*, Case No. 09-5840 SI

11          *Office Depot, Inc. v. AU Optronics*  
12          *Corporation, et al.*, Case No. 3:11-cv-02225 SI

13          *P.C. Richard & Son Long Island Corporation,*  
14          *et al. v. AU Optronics Corporation, et al.*,  
15          Case No. 3:11-cv-04119 SI

16          *SB Liquidation Trust v. AU Optronics*  
17          *Corporation, et al.*, Case No. 10-cv-05458 SI

18          *State of Florida v. AU Optronics Corporation,*  
19          *et al.*, Case No. 10-cv-3517 SI.

20          *State of Missouri, et al. v. AU Optronics*  
21          *Corporation, et al.*, Case No. 10-cv-03619 SI

22          *State of New York v. AU Optronics*  
23          *Corporation, et al.*, Case No. 3:11-cv-711 SI

24          *State of Oregon, ex rel John Kroger, Attorney*  
25          *General v. AU Optronics Corporation, et al.*,  
26          Case No. 3:10-cv-4346 SI

27          *T-Mobile U.S.A., Inc. v. AU Optronics*  
28          *Corporation, et al.*, Case No 3:11-cv-02591 SI

29          *Target Corp., et al. v. AU Optronics*  
30          *Corporation, et al.*, Case No. 10-cv-04945 SI

31          Master File No. C M:07-01827 SI  
32          MDL NO. 1827

33          STIPULATION AND [PROPOSED] ORDER  
34          REGARDING SCHEDULE TO ANSWER  
35          OR RESPOND TO DEFENDANT  
36          LG DISPLAY'S COUNTERCLAIMS

1        *Tracfone Wireless, Inc. v. AU Optronics*  
2        *Corporation, et al.*, Case No. 10-cv-03205 SI

3              Defendants LG Display America, Inc. and LG Display Co., Ltd. (together, “LG Display”) and  
4              the Direct Action Plaintiffs (“DAPs”) and State Attorneys General (“AGs”) in the above captioned  
actions stipulate as follows:

5              WHEREAS, LG Display amended its answers as of right to assert Counterclaims for Declaratory  
6              Relief (the “LG Display Counterclaims”) in *Interbond Corporation of America v. AU Optronics*  
7              *Corporation, et al.*, Case No. 3:11-cv-03763 SI, *Office Depot, Inc. v. AU Optronics Corporation, et al.*,  
8              Case No. 3:11-cv-02225 SI, *P.C. Richard & Son Long Island Corporation, et al. v. AU Optronics*  
9              *Corporation, et al.*, Case No. 3:11-cv-04119 SI, *State of New York v. AU Optronics Corporation, et al.*,  
10             Case No. 3:11-cv-711, *T-Mobile U.S.A., Inc. v. AU Optronics Corporation, et al.*, Case No 3:11-cv-  
11             02591 SI, on March 21, 2012, and in *Jaco Electronics, Inc. v. AU Optronics Corporation, et al.*, Case  
12             No. 3:11-cv-02495 SI, on March 23, 2012;

13             WHEREAS LG Display moved for leave to amend its Answers and to assert Additional  
14             Defenses and the LG Display Counterclaims in *Alfred H. Siegel, As Trustee of the Circuit City Stores,*  
15             *Inc. Liquidating Trust v. AU Optronics Corporation, et al.*, Case No. 10-Cv-05625 SI, *Best Buy Co*  
16             *Mobility LLC, et al. v. AU Optronics Corporation, et al.*, Case No. 3:09-cv-4997 SI, *Best Buy Co., Inc.,*  
17             *et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-04572 SI, *Costco Wholesale Corporation v.*  
18             *AU Optronics Corporation, et al.*, Case No. 11-cv-00058 SI, *Electrograph Systems, Inc., et al. v. Epson*  
19             *Imaging Devices Corporation, et al.*, Case No. 10-cv-00117 SI, *Motorola Mobility, Inc. v. AU Optronics*  
20             *Corporation, et al.*, Case No. 09-5840 SI, *SB Liquidation Trust v. AU Optronics Corporation, et al.*,  
21             Case No. 10-cv-05458 SI, *State of Florida v. AU Optronics Corporation, et al.*, Case No. 10-cv-3517 SI,  
22             *State of Missouri, et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-03619 SI, *State of Oregon,*  
23             *ex rel John Kroger, Attorney General v. AU Optronics Corporation, et al.*, Case No. 3:10-cv-4346 SI,  
24             *Target Corp., et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-04945 SI, *Tracfone Wireless,*  
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Master File No. C M:07-01827 SI  
MDL NO. 1827

STIPULATION AND [PROPOSED] ORDER  
REGARDING SCHEDULE TO ANSWER  
OR RESPOND TO DEFENDANT  
LG DISPLAY’S COUNTERCLAIMS

*Inc. v. AU Optronics Corporation, et al.*, Case No. 10-cv-03205 SI, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure on March 22, 2012 (hereafter, “LG Display’s Motion to Amend”);

WHEREAS the undersigned DAPs and AGs that were served with LG Display's Motion to Amend are required to file their Oppositions to that Motion on or before April 27, 2012, and LG Display is required to file its Reply(ies) in support of its Motion on or before May 8, 2012;

WHEREAS the DAPs and AGs that were served with the LG Display Counterclaims are currently required to answer, move against, or otherwise respond to those counterclaims on or about April 30, 2012;

WHEREAS the parties wish to coordinate the schedule for the briefing of LG Display's Motion to Amend and responses to the LG Display Counterclaims to allow for a more efficient use of the Court and the parties' time;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned DAPs, AGs, and LG Display, by and through their respective undersigned counsel, as follows:

(1) The time for the undersigned DAPS and AGs that have been served with the LG Display Counterclaims to answer, move against, or otherwise respond to the LG Display Counterclaims shall be held in abeyance pending the resolution of LG Display's Motion to Amend.

(2) The time for the undersigned DAPs and AGs, including without limitation the DAPs and AGs already served with the LG Display Counterclaims, to answer, move against, or otherwise respond to the LG Display Counterclaims shall be extended to and including twenty-eight (28) days after the Court rules on LG Display's Motion to Amend.

(3) If the DAPs move against the LG Display Counterclaims, they shall file a combined motion to dismiss. Subject to this requirement, each and every DAP reserves the right to file separate motions to dismiss the LG Display Counterclaims to address any questions of law or fact not common to all DAPs.

(4) If the DAPs and/or AGs move to dismiss the LG Display Counterclaims, LG Display shall file its Opposition to such motion twenty-eight (28) days after the DAPs and/or AGs file their respective motions.

(5) The DAPs and/or AGs shall have fourteen (14) days to submit their Replies.

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2 SO STIPULATED:  
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5 Dated: April 26, 2012  
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23 **IT IS SO ORDERED.**



24 The Honorable Susan Y. Illston  
25 United States District Judge

26 Dated: 4/30, 2012